United States District Court Eastern District of Michigan

Salif A. Kourouma,

Plaintiff,

Civil No.

v.

Honorable Mag. Judge

Benjamin A. Anchill, Assistant U.S. Attorney, U.S. Department of Justice,

Defendant.

Notice of Removal

Defendant, Benjamin A. Anchill, petitioner herein, by his attorneys, pursuant to 28 U.S.C. §§ 1442(a)(1) and 1446, hereby removes this action (Case No. 24172736), which is now pending in the 36th Judicial District for the State of Michigan from said state court to the United States District Court for the Eastern District of Michigan, Southern Division.

Plaintiff seeks to sue defendant Benjamin A. Anchill, who at all relevant times was an employee of the U.S. Attorney's Office, which is an agency of the United States of America. This action is removable under 28 U.S.C. § 1442 and 28 U.S.C. § 2679(d) because the Attorney General, through his designee, Kevin R. Erskine, Chief of the Civil Division of the United States Attorney's Office for the

Eastern District of Michigan, has certified that defendant Benjamin A. Anchill was acting within the scope of his employment at the time of the incident out of which this suit arose. (Exhibit A – Certification of Scope of Employment). As such, plaintiff's claim is one against the "United States or any agency thereof or any officer . . . of the United States or of any agency thereof, sued in an official or individual capacity for any act under color of such office" 28 U.S.C. § 1442(a)(1).

The above-entitled action was filed against defendant on or about November 25, 2024; formal service of process was made upon the petitioner on or about December 5, 2024. Copies of all process and pleadings in possession of petitioner are attached hereto.

Respectfully submitted,

Dawn N. Ison United States Attorney

s/Zak Toomey

Zak Toomey Assistant U.S. Attorney 211 W. Fort St., Ste. 2001 Detroit, MI 48226 (313) 226-9617 Zak.Toomey@usdoj.gov MO61618

Date: December 10, 2024

Certificate of Service

I hereby certify that on December 10, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system.

I further certify that I have mailed by U.S. mail the foregoing paper to the following non-ECF participants:

36th District Court ATTN: Civil Division 421 Madison St. Detroit, MI 48226 and sent via Fax to: (313) 967-7551

Salif A. Kourouma 37715 Lakewood Circle, Apt. 205 Westland, MI 48185

s/Zak Toomey

Zak Toomey Assistant U.S. Attorney 211 W. Fort St., Ste. 2001 Detroit, MI 48226 (313) 226-9617 Zak.Toomey@usdoj.gov MO61618

Case 2:24-cv-13278-MA	G-EAS ECF No. 1, PageID.4 F	Filed 12/10/24 Page 4 of 7
Approved, SCAO	Original - Court 1st copy - Defendant	2nd copy - Plaintiff 3rd copy - Return
STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT	24171166 PO1 CT A 11/25/24 SUMMONS	CASE NO. 24172736 :A.HINNANT JD
COUNTY COUNTY	DETROIT PAID:	Court telephone r
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Plaintiff's name, address, and telephone no.	SIBS V Assist	s Department of This
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This is a business case in which all o MDHHS and a contracted health plan the complaint will be provided to MDH There is no other pending or resolved complaint.	n may have a right to recover expenses in HHS and (if applicable) the contracted he distributed action arising out of the same transport of the same trans	or commercial dispute under MCL 600.8035 in this case. I certify that notice and a copy cealth plan in accordance with MCL 400.106(saction or occurrence as alleged in the
A civil action between these parties of	r other parties arising out of the transact	ion or occurrence alleged in the complaint h
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You are being sued. YOU HAVE 21 DAYS after receiving to and serve a copy on the other party of were served outside of Michigan). If you do not answer or take other act demanded in the complaint. If you require accommodations to use	or take other lawful action with the contion within the time allowed, judgment me the court because of a disability or if you coceedings, please contact the court improve	int to file a written answer with the court urt (28 days if you were served by mail or you be entered against you for the relief ou require a foreign language interpreter
1115/24 2/9	ore its expiration date. This document must be sea	led by the seal of the court
This summons is invalid unless served on or belo	The deputation date. This designed agest be sea	So by the soul of this court.

Case 2:24-cv-13278-MAG-EAS ECF No. 1, PageID.5 Filed 12/10/24 Page 5 of 7 Original - Court 2nd copy - Plaintiff Approved, SCAO 1st copy - Defendant 3rd copy - Return STATE OF MICHIGAN CASE NO. 36TH JUDICIAL DISTRICT COMPLAINT JUDICIAL CIRCUIT 24172736 \$10.HIMMANT JO Page pages **COUNTY PROBATE** Court address Court telephone no Civil Division, 421 Madison St., Detroit, MI 48226-2358 (313) 965-5952 Plaintiff's name(s), address(es), and telephone no(s). Defendant's name(s), address(es), and telephone no(s). Plaintiff's attorney, bar no., address, and telephone no. Signature MC 01a (6/19) COMPLAINT

SAU Case 2:24-cv-13278-MAG-EAS ECFANO:11, Page ID 6 Filed 12/10/24 Page 6 of 7 37715 Latewood eincle case# 24142736 JAG: A HINNANT Westland, Mi 48185 V Benjamin A. Anchill Assistant Attorney general us begant ment of sustice separtment Ms Anchill Jean U.S justice Benjamin can your e recover all the funds that was paid to child support my case number 106467 DM and pay me . Plastic Ommum Auto Inergy didn't want to take me boack after my fMLA leave to my sidelity account reopen it for I flely disability account reopen it for I flely disability I Plenty Disability

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